

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PREZERV TECHNOLOGIES, INC.,

Plaintiff,

v.

**ALESSANDRO MORARI, GIACOMO
DOMENICONI, BARTOLOMEO
GAROFALO, and SOLIDIUM AI, INC.,**

Defendants.

**Civil Action No.
1:21-cv-11918-FDS**

MODIFIED PRELIMINARY INJUNCTION

SAYLOR, C.J.

Alessandro Morari, Giacomo Domeniconi, Bartolomeo Garofalo, and Solidium AI, Inc., their officers, agents, employees, attorneys, and those persons in active concert with them who receive actual notice of this Order (“Defendants”) are hereby preliminarily enjoined as follows:

1. Defendants shall cease use of all data, documents, business plans, or other information belonging to, created by, or derived from the confidential information, trade secrets, documents, data, and/or assets of Prezerv Technologies, Inc.
2. Defendants shall preserve all data, documents, business plans, or other information in its possession belonging to, created by, or derived from the confidential information, trade secrets, documents, data, and/or assets of Prezerv Technologies, Inc. Such materials shall include, but not be limited to, all materials: (1) collected in response to the

November 10, 2021 temporary restraining order and/or the December 7, 2021 preliminary injunction and (2) all forensic data, access logs, shortcut logs, jump list logs, and any other data evidencing Defendants' use of any devices, drives, and/or online services or platforms.

3. Except as set forth above, any materials collected by a third-party vendor from Defendants in response to the November 10, 2021 temporary restraining order and/or the December 7, 2021 preliminary injunction shall remain in that vendor's custody and control and shall not be deleted or destroyed until further order of this Court or mutual agreement by the parties.

4. Defendants are enjoined from conducting any business relying upon or making use of any of the confidential information, trade secrets, documents, data, and/or assets of Prezerv Technologies, Inc. This includes but is not limited to:

- a. accepting any funds, grants, or capital from any or all potential investors, partners, and/or customers, including but not limited to Y Combinator and/or similar startup accelerator programs;
- b. soliciting potential clients of Prezerv Technologies, Inc., including but not limited to Autostrade per l'Italia (and its affiliates);
- c. developing any software or code using any code, data, confidential information, and/or trade secrets of Prezerv Technologies, Inc.;
- d. pursuing any patent over any technology, technique, or process related to or using any confidential information, trade secrets, or intellectual property of Prezerv Technologies, Inc.

5. Within 10 days of this order, Defendants shall provide Prezerv Technologies, Inc.

with the following:

- a. A list of all online and/or cloud-based services and platforms used by Defendants for storage, communication, development, coding, hosting, annotation, management, or analysis. E.g., Slack, GitHub, Monday.com, Dropbox, Google, AWS, Microsoft Azure, etc.
- b. Defendants' account names or similar identification for all services and platforms listed pursuant to ¶5(a).
- c. An index of all devices and drives not already returned to Prezerv Technologies, Inc. that ever contained any confidential information, trade secrets, documents, data, and/or assets of Prezerv Technologies, Inc.

So Ordered.

Dated: December 15, 2021 4:45 p.m.
Boston, Massachusetts

/s/ F. Dennis Saylor IV
F. Dennis Saylor IV
Chief Judge, United States District Court